

REMARKS

This amendment is responsive to the Office Action mailed August 22, 2005. The Applicant thanks Examiner Neuder for the analysis contained in the Office Action. Applicant has amended Claims 1, 5, 6, 9, and 11-14. Reconsideration of the application is requested.

Informalities in the Specification

Applicant has amended all references to “educator” in the specification to correctly read --eductor--. Applicant has also amended claims 5, 6, and 11-14 to refer to --eductor--.

Claim Rejection under 35 U.S.C. 102

Claims 1 – 13 currently stand rejected under 35 U.S.C. 102(b) as being anticipated by Hatton (U.S. 5,871,340).¹

Independent claims 1, 6, 9, 12, and 13 are intended for downhole application, and have been amended to recite the “supplementary liquid channel extending through the housing from the output end to the intake end.” Hatton does not teach this element of the claims. Hatton teaches an apparatus that would be unusable for a downhole application. This is evident from the drawings, where the twin screw pump is perpendicular to the overall input/output flow of fluid, and would therefore be impossible to use downhole. Hatton is also unsuitable for downhole applications in that supply line 204 is in external housing 114, which would be extremely difficult if not impossible to install downhole.

¹ The Office Action addresses only Claims 1-13, while the application includes 14 claims as set forth in a preliminary amendment filed with the application. For purposes of this response, applicant argues for the allowability of Claim 14 along with Claims 1-13.

Applicant's claimed invention is for use in downhole applications, as stated in the preambles of independent claims 1, 6, 9, 12, and 13. To clarify the distinction between applicant's invention, and the teachings of Hatton, claims 1, 6, 9, 12, and 13 now refer to a "supplementary liquid channel extending through the housing from the output end to the intake end," in order to clarify that aspect of the supplementary liquid channel as shown in the drawings. The supplementary liquid channel thus allows fluid to be recirculated from the output end to the intake end without providing any external channels, and is therefore suitable for downhole applications.

As claims 2-5, 7, 8, 10, 11 and 14 depend either directly or indirectly from claims 1, 6, 9, 12, and 13, it is respectfully submitted that these claims are now also in condition for allowance.

In view of the foregoing amendments, it is respectfully submitted that the present application is now in condition for allowance. Applicant, therefore, requests the early issue of a Notice of Allowance.

Respectfully submitted,

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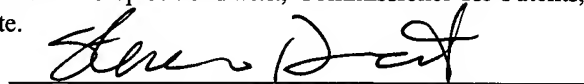
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